

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ROCKLAND

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VLADMIR SANCHEZ,

Index No.: 031949/2016

Plaintiff,

AFFIDAVIT

-against-

LUCY MORTENSEN,

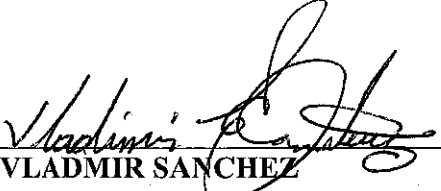
Defendant.

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I, VLADMIR SANCHEZ, being duly sworn under the penalty of perjury, deposes and says the following:

1. I am the Plaintiff in the instant matter.
2. On September 3, 2015, I was training with a group of cyclists, traveling from the area near and around the George Washington Bridge, in New Jersey, and biking north into Nyack, County of Rockland, State of New York.
3. At the time of the accident, the group was near the town of Piermont and continuing northbound on Rockland Road. We were traveling approximately 25 miles per hour, when a female driving a vehicle approached our group from the rear, honking her horn.
4. Our group was traveling single file and all moved right to let her pass.
5. I was the first bicyclist of the group. As the vehicle passed me, she immediately, simultaneously, pressed on her brake and stopped in front of me with no left turn signal on.
6. I tried to maneuver my bicycle to the left to avoid contact with said vehicle, as there was nowhere to move right (except for a ditch).
7. When I maneuvered left, I struck my right arm and shoulder on the driver's side mirror as she turned left.
8. The female driver of said vehicle continued into a residential driveway, where I now know she resides.
9. I rapidly fell to the ground with my bicycle and was in pain.

10. At the time of the subject accident, I was wearing a helmet and goggles and riding a professional bicycle that cost approximately \$7,000.00.
11. Following the subject accident, someone called an ambulance and I was taken to Nyack Hospital, where my right arm was placed in a sling.
12. I have been in pain since the subject accident in my dominant, right arm, shoulder and neck area.
13. On April 26, 2016, I had undergone shoulder surgery at Long Island Jewish Medical Center, currently known as Northwell Health.
14. I remain, to this day, unable to train on my bicycle with my group, along with being unable to perform regular daily duties that I did prior to the subject accident.


VLADMIR SANCHEZ

Sworn to and subscribed before me
08 day of November, 2016.



Notary Public

VERONICA F JUAREZ
NOTARY PUBLIC
STATE OF NEW JERSEY
ID # 50024487
MY COMMISSION EXPIRES OCT. 14, 2020